

FCC Received January 3, 1994 @ 5:10 p.m.
Dona A. Bradshaw

ORIGINAL

TRANSCRIPT OF PROCEEDINGS

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

IN THE MATTER OF:

MM DOCKET NO. 93-75

TRINITY BROADCASTING OF FLORIDA, INC.
and
GLENDALE BROADCASTING COMPANY

RECEIVED

JAN 10 1994

Miami, Florida

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

DATE OF HEARING: December 15, 1993

VOLUME: 17

PLACE OF HEARING: Washington, D. C.

PAGES: 2423-2595

FREE STATE REPORTING, INC.
Court Reporting Depositions
D.C. Area (301) 261-1902
Balt. & Annap. (410) 974-0947

RECEIVED

JAN 10 1994

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

-----)
In the matter of:)

TRINITY BROADCASTING OF FLORIDA, INC.)
and)
GLENDALE BROADCASTING COMPANY)

MM DOCKET NO. 93-75

Miami, Florida)
-----)

The above-entitled matter came on for hearing
pursuant to Notice before Judge Joseph Chachkin,
Administrative Law Judge, at 2000 L Street, N.W., Washington,
D.C., 20554, in Courtroom No. 3, on Wednesday, December 15,
1993, at 9:15 a.m.

APPEARANCES:

On behalf of Trinity Broadcasting of Florida, Inc.:

NATHANIEL EMMONS, Esquire
CHRISTOPHER HOLT, Esquire
EUGENE MULLIN, Esquire
HOWARD TOPEL, Esquire
Mullin, Rhyne, Emmons and Topel, P.C.
1000 Connecticut Avenue, Suite 500
Washington, D.C. 20036-5383

On behalf of Glendale Broadcasting Company:

LEWIS COHEN, Esquire
Cohen & Berfield
1129 20th Street, N.W., Suite 507
Washington, D.C. 20036

On behalf of S.A.L.A.D.:

DAVID HONIG, Esquire
DAVID McCURDY, Esquire
1800 N.W. 187 Street
Miami, Florida 33056

FREE STATE REPORTING, INC.
Court Reporting Depositions
D.C. Area (301) 261-1902
Balt. & Annap. (410) 974-0947

1 APPEARANCES (Continued):

2 On behalf of Mass Media Bureau:

3 JAMES SHOOK, Esquire
4 GARY SCHONMAN, Esquire
5 Mass Media Bureau
6 Federal Communications Commission
7 2025 M Street, N.W., Suite 7212
8 Washington, D.C. 20554
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

1					
2					
3	<u>Witness</u>	<u>Direct</u>	<u>Cross</u>	<u>Redirect</u>	<u>Recross</u>
4	Dr. Paul Crouch				
5	By Mr. Shook		2426		
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24	Hearing Began: 9:15 a.m.		Hearing Ended: 4:00 p.m.		
25	Lunch Began: 12:30 p.m.		Lunch Ended: 1:37 p.m.		

P R O C E E D I N G S

(9:15 a.m.)

JUDGE CHACHKIN: Who is going to conduct cross? Go ahead, Mr. Shook.

Whereupon,

DR. PAUL CROUCH

having previously been duly sworn, was called as a witness herein and was examined and testified as follows:

CROSS-EXAMINATION

BY MR. SHOOK:

Q Dr. Crouch, I'd like you to refer to your written testimony, which is TBF Exhibit 104. It appears in Volume 2B of your testimony. I believe you have it there. I'd like you to turn to page 4, paragraph 9.

A Yes, sir. I'm there.

Q Specifically, focus on the third sentence. And the words that I want you to look at are "owned and operated companies."

A Yes, sir.

Q Could you give me your understanding as to what -- how you would define in the context of TBN an "owned and operated company," and you can, you can do it from the present and then we can work our way back.

A Yes. I, I would define that as being all licensees that have a common Board of Directors, or at least a majority of common Board of Directors.

1 Q So, the Boards do not have to have an exact -- the
2 exact same Directors? There can be, say, two Directors in one
3 that are common with two in another, and the two in each are
4 going to be majority me-- of the Board, but the third person
5 can be somebody different?

6 A I could give you a, a simple example. Mr. Juggert,
7 myself, and my wife, Janice Crouch, are generally the three
8 common Directors to the various TBN owned and operated stat-
9 ions. However, in Poughkeepsie, New York, for example, Mrs.
10 Grace Cephas, the station manager, is also a Board member.
11 So, in the case of TBNY, Trinity of New York, four members;
12 but KTBN, Channel 40, Southern California, it would be the
13 three Board members. So, if -- in other words, if there are a
14 ma-- a majority of the members are common to these various
15 entities, I would classify them as basically owned and operat-
16 ed stations.

17 Q Now, let me flesh that out with perhaps a couple
18 more examples. You've mentioned New York. What is the situa-
19 tion in Florida? Who are the Directors there?

20 A At this time, in Florida it is, to the best of my
21 remembrance, the identical same three members as KTBN in
22 southern California.

23 Q How about Indiana?

24 A Indiana would be the same three.

25 Q And only the same three?

1 A Yes.

2 Q There are no other Directors in Indiana?

3 A No, sir.

4 Q Arizona?

5 A Arizona for a time had the three common Directors
6 and my brother Philip Crouch was a Director, but he's now
7 moved to Texas, so -- and I believe he has resigned off of
8 that Board, so I believe at this moment it would simply be the
9 three common members again.

10 Q Oklahoma City?

11 A Oklahoma City does have another member. A Mr. John
12 Benefiel, B E N E F I E L, a local businessman, is a member of
13 the Trinity of Oklahoma City.

14 Q Is he involved in the operation of the station in
15 any way?

16 A Not as an employee.

17 Q Texas?

18 A Texas? It would be the three common members that
19 I've just mentioned.

20 Q Washington?

21 A Washington would be the three common members.

22 Q Now, is that situation -- the situation that you've
23 just described, has that been the same over the years or have
24 there been other persons who have commonly been members of the
25 Board, for example, such as station managers? You mentioned

1 in New York that the station manager is a member of the Board.
2 Is that peculiar to New York or has that situation existed
3 with respect to other stations in the past?

4 A It, it exists even now in Denver, for example, that
5 Trinity of Denver has Mr. George Hernandez is a member of the
6 Board of Trinity Broadcasting of Denver. It has varied a
7 little bit through the years. In some cases, as in the case
8 of Arizona, for example, when the station manager was for a
9 time a member of the Board of Directors. There has been no
10 real compelling pattern or policy. It's just sort of been --
11 in, in the case of Florida, for example, as we were acquiring
12 that station and seeing its growth and development, we just
13 felt that it needed some additional -- I think for a time,
14 perhaps still is, Mrs. Duff's husband Ralph was an Officer,
15 not a, a Board member.

16 Q Right. Well, what I'd like you to focus on now in,
17 in, in response to my questions are the Board members. I'm
18 not concerned about Officers right now.

19 A All right.

20 Q Speaking of Florida, there was a time, was there
21 not, when a Mr. Ridings was a Board member?

22 A I believe he was, sir.

23 Q Now, was he involved in the operation of the station
24 in any way?

25 A Yes. He was the station manager.

1 Q Now, how long was he a member of the Board in
2 Florida, if you can recall?

3 A It would be a period of probably three years or so.

4 Q And during that period he was station manager as
5 well?

6 A Yes, sir.

7 Q So, in terms of Board membership on an operating --
8 an owned and operated company, would you say that it was
9 common or uncommon for the station manager to be a member of
10 the Board?

11 A I guess I would have to characterize it as being a
12 little more uncommon than common because there were more
13 stations that did not have that condition as did have it.

14 Q And can you give any explanation as to why we would
15 have that situation where in some instances the station mana-
16 ger would be a Board member, in other instances not?

17 A Mr. Shook, I think you'll find that this was the
18 case perhaps more in the earlier days of, of Trinity than
19 perhaps today. As we were working to acquire new stations, it
20 just seemed desirable -- in some of those start-up operations
21 it was very convenient to have a member of the Board and an
22 Officer on deck or on duty, so-to-speak, to handle matters, to
23 sign documents, to take care of, of business that needed to be
24 conducted on a local business -- on a local basis. So, I, I
25 think that would probably be the, the most important reason

1 for that.

2 Q All right. So, would it be fair to state then that
3 today it would be uncommon for a station manager to be a
4 member of the Board, but if we were to go back to the period
5 of the Network's growth in terms of owned and operated sta-
6 tions, say from 1977, I believe, when Arizona came on to 1987
7 when Dallas came on, that it was more common then to have a
8 station manager be a member of the Board?

9 A I think that's a fair statement, Mr. Shook. Let,
10 let me add one other little thought that might help us here.
11 I, I think the maturity of the individual certainly had some
12 bearing here to. If it were a, a seasoned, mature individual
13 that we had confidence in and had confidence would see to the
14 interests of Trinity Broadcasting, I think there was more of a
15 tendency to have that individual as a member locally of the
16 Board as otherwise.

17 Q So, you could have a level of confidence in someone
18 for that person to be station manager but not quite enough
19 confidence in that person to make him a member of the Board?

20 A Yes, sir?

21 Q Now, given what you've told me about owned and
22 operated companies and how it was that you would look to a
23 commonality of the Board of Directors and, in some instances,
24 an identity of the members of the Board of Directors among the
25 various companies, would you say that there ever was a time

1 when Translator TV, Inc., fell within your definition of an
2 owned and operated company?

3 A I would, I would have never classified TTI, later
4 NMTV, as an owned and operated company because it simply never
5 had that commonality of Board members.

6 Q Well, explore that for a minute. Back in 1980 when
7 TTI was formed, the first three Directors were yourself, Mrs.
8 Duff, and Reverend Espinoza. Now, looking at the documents,
9 and, you know, we can look at them in more detail as we go
10 through this, it's my understanding that there were several
11 years where the TBN Board consisted of yourself and Mrs. Duff
12 and Mr. Juggert, simply the three of you. Now, the way I
13 understand it, then, that would seem to me that we have the
14 requisite commonality of Directors and that therefore TTI
15 would have fallen within your definition of an owned and
16 operated company during those years.

17 A I'm searching my mind, Mr. Shook, because there were
18 other members of the Board of Trinity. There was a, there was
19 a time when a gentleman by the name of Paul Toberty was on the
20 Board, and I'm a little hazy on just when he resigned.

21 Q Well, didn't he resign at the same time Demos
22 Shakarian resigned?

23 A No. No, Mr. Shakarian resigned later, after Mr.
24 Toberty, I believe.

25 Q Well, let's think of it in terms of when Mrs. Duff

1 | joined the Board. When Mrs. Duff joined the Board, didn't the
2 | Board of TBN consist of yourself and Mr. Juggert?

3 | A I believe that is the case.

4 | Q And Mrs. Duff made the third member of the Board,
5 | and that that membership stayed the same until your wife
6 | joined the Board in May of 1983?

7 | A I, I believe that is the case, yes.

8 | Q All right. Well, with that being the case, we have
9 | a period, then, between 1979 and May of 1983 when the Board of
10 | TBN is yourself, Mr. Juggert, and Mrs. Duff. Now, likewise
11 | during several years of that same period, the Board of
12 | Translator TV, Inc., is yourself and Mrs. Duff and Reverend
13 | Espinoza. So, we have two persons, yourself and Mrs. Duff, as
14 | members of both of those Boards. Now, with that in mind,
15 | would it be fair to state that during those years of at least
16 | common Directors that TTI was an owned and operated company of
17 | TBN?

18 | A I suppose if you're going to use my, my definition,
19 | there, there may have been a period of time. I had never
20 | focused on that. Remember, however, that that was a period of
21 | time when TTI was not the licensee of any kind of broadcast
22 | property. It was a very uncertain time for TTI. It was a
23 | time when we didn't really quite know what the policy of the
24 | Agency was going to be. We didn't know what its future held
25 | for it at all. So, I suppose I will have to concede that for

1 some period of time there was that commonality of Board mem-
2 bers. And yet I have to say, sir, that in my mind, at least,
3 it never was considered by me to be in the same class as an
4 owned and operated entity.

5 Q You do understand, however, don't you, that during
6 that period although Translator TV, Inc., did not hold any
7 licenses it, it was an applicant before the Commission?

8 A Yes, sir, it was.

9 Q Now, I'd like you to --

10 A Now -- however, may I just say this? It, it was an
11 applicant only in the low-power class of station, which would
12 not have put it in conflict in any way with the ownership
13 policies of the Agency.

14 Q No, I don't dispute that, in terms of full-power
15 stations. I don't dispute that. I'm just exploring with you
16 what's going on here.

17 A Yes, sir.

18 Q I'd like you to focus your attention now on para-
19 graph 15 of your testimony, specifically, the last sentence
20 that appears on page 6 and carries over to page 7.

21 A Yes, sir. I have read that paragraph.

22 Q Now, I take it that the reference to PTL is, I
23 suppose, what I have been calling Praise the Lord Newsletter?

24 A Yes.

25 Q Could you tell me when that newsletter started?

1 A We may not have called it Praise the Lord at the
2 time. The first little newsletter that I recall was actually
3 written in early 1973 as we were just getting started with
4 programming for the Trinity Broadcasting Network.

5 Q Did there come a time when the newsletter evolved to
6 something that would be coming out on a regular basis, such as
7 once a month or perhaps once every other month?

8 A Yes. Quite early it developed into a simple, regu-
9 lar, monthly little report of the activities of the, the
10 Network to the, the viewers and supporters.

11 Q Would that have been the purpose of the newsletter,
12 to simply inform persons as to what was going on at Trinity?

13 A It would have -- that would have been part of the
14 reason. It, it was -- a newsletter in any ministry organiza-
15 tion fulfills several purposes. It, hopefully, informs the
16 donors and the supporters of that ministry as to the activity
17 and the goals and the aspirations of that ministry through an
18 article, through pictures, through reports, through news and
19 encourages them to support financially the works of that
20 ministry.

21 Q Would it be fair to state that the basic purposes of
22 a newsletter over time have been to inform the people who were
23 interested in Trinity's activities and solicit their financial
24 support for those activities?

25 A That's certainly part of it. It also has, from my

1 perspective, a, a purpose of enthusing the viewers and sup-
2 porters with the forward thrust and division of that ministry,
3 and it's goals for the future as well.

4 Q And to that extent, I, I suppose you're, you're
5 talking about a religious purpose in a way, that it's to help
6 the faithful stay faithful in a way, I suppose?

7 A Not only that, sir. That's certainly part of it.
8 But also to, as I said in my testimony yesterday, to, to ful--
9 to fulfill the command of this, of this Bible to literally go
10 into all the world and preach the Gospel to every creature.
11 That is, that is our mission. That is our command.

12 Q Okay. And when you make reference to the Great
13 Commission, that's what you're talking about, at the end of
14 the Gospels when Jesus tells his disciples to go out and
15 preach the Gospel to all nations?

16 A Precisely.

17 Q And, so, the newsletter is one means of that?

18 A Yes, sir.

19 Q Now, in terms of solicitations, the newsletter would
20 be used not only to solicit for TBN generally, but wouldn't it
21 also be used to solicit for special projects?

22 A On occasion it would be, yes.

23 Q Would there be any correlation between the
24 newsletter and Network telethons?

25 A Yes.

1 Q And could you tell us what that correlation is?

2 A Typically, Trinity conducts two annual telethons;
3 one in the spring, one in the fall. The newsletter that is
4 issued the month prior to those newsletters would generally
5 sort of set the course for that particular telethon, informing
6 the, the readers, the viewers of what the new projects, the
7 goals, the aspirations for the next six months would be.

8 Q So, I suppose in that sense there had to be some
9 planning or coordination between the people who are putting
10 together the newsletter and the people, if they're different,
11 who are going to be putting on the telethon so that if the
12 newsletter is soliciting for project A that project A actually
13 is part of the telethon that's broadcast?

14 A I would be primarily that common person linking the
15 newsletter and the actual telethon itself. Other staff mem-
16 bers would have put the newsletter together while other staff
17 members and invited guests would pretty much conduct the, the
18 telethon itself.

19 Q Well, so, in that case would it be fair for me to
20 assume that in the case of the newsletter if there are a
21 listing of special projects that you would pay a special
22 attention to what those projects were because, as you've just
23 mentioned, you're the common link between the newsletter and
24 what's going to happen on TV?

25 A Yes. However, I'm only one person in the greater

1 number of players in the actual telethon. I lead the, the
2 nighttime -- generally, the nighttime prime-time hours of the
3 telethon, but others lead the earlier portions of the day.
4 And, quite frankly, the smaller individual projects for a
5 particular program, a particular equipment need, that sort of
6 thing, generally is conducted in the morning and afternoon
7 hours while the fewer larger ticket items, if you will, the
8 raising, for example, of the satellite time, which is a very
9 expensive item, the raising of the funds to hopefully acquire
10 new stations, low-power and/or other class of stations, the
11 foreign projects, et cetera, would generally be conducted by
12 myself in those evening hours.

13 Q So, your greatest concern would be with those pro-
14 jects that were the most expensive?

15 A Yes, sir.

16 Q Now, in terms of the other persons, could you give
17 me some idea now as to who would be involved in the coordina-
18 tion process between the newsletter and the telethon with
19 respect to the less expensive projects?

20 A Input would have come, for example, from Mr. Ben
21 Miller, our, our Director of Engineering, for particular
22 equipment needs. The Programming Department would give input
23 as to the needs for the many different programs that we
24 produce, up to 40 different programs, and each program obvi-
25 ously has a, a budget. The daytime hours would be pretty much

1 consumed with equipment and programming projects, although not
2 exclusively.

3 Q Would it be typical or atypical for a person who is
4 a programmer to appear on the telethon and, and solicit in any
5 way in behalf of his own program?

6 A Very typical. Perhaps one example would be in order
7 here.

8 Q Well, let's say Dr. Hill.

9 A Dr. E. V. Hill would appear probably more typically
10 in the evening hours as a, as a -- he is such an eminent
11 speaker, we, we would turn him loose for an hour to just
12 preach one of his classic messages. But of course everybody
13 knows Dr. Hill's program is, is on, and so I'm sure that cer-
14 tainly was beneficial in helping to raise the budget for his
15 particular program.

16 Q So, he could serve a twofold purpose. He was dyna-
17 mic enough and interesting enough that he could cover not only
18 his own program but raise money for, you know, the general
19 budget or the more expensive projects at the same time?

20 A I think, I think even the attendees at the
21 Republican National Committees of which he was the -- conven-
22 tions, rather, of which he was the keynote speaker on two
23 different occasions would have to agree with that. He is, he
24 is an eminent speaker.

25 Q Well, why don't we think in terms of the lesser

1 light then. Let's, let's pick a different example. You pick
2 one and give me an idea how it would work.

3 A Okay. Let's take a music program. Probably one of
4 the earliest we ever produced was a very well-known Gospel
5 singer by the name of Nancy Harmon. She's been a programmer
6 almost since the inception of Trinity. And she conducts a, a
7 weekly, primarily musical program with musical guests and her
8 own singers and musicians with words of inspiration in, in
9 between the songs and sometimes a short message. And, so, it
10 would be not at all untypical for Ms. Harmon to appear for
11 maybe a period of an hour or two on a, on an afternoon segment
12 to assist Mr. J. Jones, our staff member who le-- typically
13 leads the afternoon -- morning, afternoon sessions of the
14 telethon, to appear with him and encourage donors to support
15 her program.

16 Q Has Mr. Jones been the afternoon and -- was he also
17 a morning coordinator too or just the afternoon?

18 A Pretty much the, the morning and early afternoon and
19 --

20 Q Early afternoon.

21 A And I'd come in in the late afternoon, early evening
22 hours.

23 Q All right. Would it -- are, are you two the, the
24 basic two, then, who are responsible for more or less leading
25 the telethons?

1 A Yes, sir.

2 Q Has that changed over time? If we go back 13 years,
3 what, what has -- what, if anything, has changed in that
4 period?

5 A Very little. Mr. Jones has been with us, to my
6 recollection, all that time. He's a very long-term member of
7 the staff.

8 Q A very trusted member, then, too?

9 A Indeed.

10 Q Would you two have -- would it be typical for the
11 two of you to discuss, you know, what he is going to do in
12 terms of the projects that he is going to cover or how it's
13 going to be divided between the two of you?

14 A That's just evolved during the years. It's just we
15 don't even hardly have to discuss it anymore. He, he, he
16 takes the smaller program equipment projects in the earlier
17 part of the day and I take the bigger ticket items in the
18 evening.

19 Q But you're then aware of what he's doing?

20 A Generally speaking, yes.

21 Q During the earlier periods when this was, I guess,
22 not as well worked out as, as it seems to be now, would you
23 pay a little bit more attention to what was being solicited in
24 the morning and the afternoon?

25 A I would certainly be aware of the general

1 categories. The, the programs were the programs. Any program
2 that had been approved and, and was, was approved for air,
3 that was that. The, the budget had to be raised and I
4 wouldn't have gotten in on that. The, the particular -- the
5 area I would have gotten involved in probably more particu-
6 larly would be the, the acquisition of pieces of equipment.
7 Every station manager just before telethon typically issues
8 his --

9 Q Wish list?

10 A -- wish list, and we go over that and the
11 Engineering Department and I sort of separate the, the wheat
12 from the chaff and, and the final approval is made as to what
13 projects generally will be submitted to the viewers for their
14 support.

15 Q Is that final cut something that you determine?

16 A Probably so. I, I think the recommendation of the
17 station managers and the Engineering Department is certainly
18 -- sometimes you have no choice. If a piece of equipment is
19 worn out and no longer usable, you have no choice. You have
20 to approve something that's absolutely necessary. There are,
21 of course, discretionary items that sometimes we will line
22 item veto, but that's about the process.

23 Q So, with that being, with that being the case, would
24 I be correct that if a newsletter is going to go out now
25 before the, the telethon and the newsletter has a list of,

1 say, 20 special projects, you would have looked at and
2 approved or disapproved that list of 20?

3 A Generally speaking, yes.

4 Q Would that also have been true in the last 13 years?
5 Are you the final say or is there somebody else who would make
6 that cut?

7 A It, it would, most generally, have at least gone by
8 me. Now, sometimes something can get picked up from a, a
9 previous telethon or newsletter. It's a continuing, ongoing
10 project and, you know, in some cases it just automatically
11 gets added in. I can't say that I absolutely saw and approved
12 each and every project that went into the newsletter, but,
13 generally speaking, I, I was pretty much aware of what those
14 projects were and gave my approval or disapproval of them.

15 Q All right. Well, I'm trying to determine, you know,
16 where the buck stops. I mean, generally, the president -- at
17 least, with Mr. Truman, for example, he had this little thing:
18 the buck stops here. And I just want to know that in the case
19 of the newsletter did the buck stop with you or did it stop
20 someplace else in terms of approving a project that's going to
21 appear in a newsletter and is also going to be a part of the
22 telethon?

23 A The, the buck pretty much stopped on my desk.

24 Q Now, also, in light of the purposes and audience for
25 the newsletter, would it be fair to state that TBN has always

1 | endeavored to assure that the newsletter was truthful and
2 | accurate?

3 | A By TBN you mean me?

4 | Q Well, let's start with TBN. And then if we can
5 | personalize it, we, we will.

6 | A Well, of course, TBN is a corporation an the cor-
7 | poration is only a reflection of its, of its members. So --

8 | Q All right. Well, it's apparent your -- you want to
9 | tell me who the people are, so go ahead.

10 | A I'm, I'm not sure I could remember each and every
11 | person, you know, 20, 15, 13 years ago, that were members of
12 | the staff that would have participated in --

13 | Q Well, let's take it from the present and see if we
14 | can work our way back. So, I mean --

15 | A All right.

16 | Q -- right now we have yourself, and then there's Mr.
17 | Jones who apparently is involved. And who are the other
18 | people who would be presently involved? And, and the part
19 | that I'm looking at right now is the newsletter, that would be
20 | putting together the special projects that are going to appear
21 | on the next telethon.

22 | A Okay.

23 | Q That's, that's the focus.

24 | A Well, let's take the most recent telethon of
25 | November. That would have been -- there would have been

1 several people involved in putting that newsletter together.
2 I would typi-- I did write the, the main article. My wife
3 generally takes the, the, the pictures that are put in that
4 newsletter. Her assistant, Mrs. Joanie Christ, C H R I S T,
5 would basically lay it out and compose the newsletter. Mr.
6 John --

7 Q In other words, the captions that would go with the
8 pictures?

9 A Yes. She would typically write those captions. A
10 Mr. John Kleinpeter would then compose it in the computer, do
11 the color scanning for the pictures, get it ready for trans-
12 port to the, to the printing press, to the printing company.

13 Q Was there a final editor or reviewer in terms of,
14 you know, a person has the responsibility to look at that
15 newsletter from beginning to end and see that it says what you
16 want it to say?

17 A In some cases, I had the responsibility of doing
18 that. I always tried to look at that newsletter. There are
19 times when I'm travelling and, and simply can't do that. And
20 that in, in some cases my wife would be the final reviewer of,
21 of that newsletter before it went to press. In some cases,
22 Mrs. Christ would be the final reviewer before it went to
23 press. I can't think of anybody else that would probably have
24 been involved in a final review or sign-off and approval of it
25 before it went to press.

1 Q So, basically, the three persons you mentioned,
2 yourself, your wife, and Mrs. Christ, would have been the
3 three, say over the 13 years that we're really focusing on
4 here?

5 A They would have been the primary ones. I cannot say
6 exclusively, but primarily.

7 Q And would that job have generally fallen to you?

8 A Yes.

9 Q Now, yesterday the Judge asked you a number of
10 questions concerning the use of the word "integration." I
11 want you to turn to page 8 of your po-- of your testimony.
12 And just to put yourself in the time period, you know, take a
13 look at paragraphs 18 and 19.

14 A Yes, sir. I've read that.

15 Q All right. Now, the particular sentence I want you
16 to focus on for the purpose of the next couple of questions is
17 the sentence in paragraph 19 that reads: "Mr. Wiley impressed
18 upon me very strongly that the emerging policy of the FCC was
19 to foster the integration of minorities into broadcasting."
20 Do you see that?

21 A Yes, sir.

22 Q Now, is that where your first understanding of the
23 concept or the word "integration" came from?

24 A In this context?

25 Q Well, would I be correct that, you know, the word